

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

EXHIBIT LIST

Bankruptcy Case No. 23-30352
Adversary Case No:

Bankruptcy Case Title: In re: Drain Services, Inc.
Adversary Case Title:

EX. NO.	DATE	WITNESS	DESCRIPTION	WILL OR MAY	* STIPULATED	O F F E R E D	§ O B J E C T I O N	R E S E R V E D	O V E R R U L E D	S U S T A I N E D	W I T H D R A W N	R E C E I V E D
Claim 6	11/19/24	Tim Ziemba	Choice Bank Amended Proof of Claim, with all attachments	Will								
CB-1	11/19/24	Tim Ziemba	Drain Services, Inc. Default Notice dated 10/16/24	Will								
CB-2	11/19/24	Tim Ziemba	Drain Services, Inc. Default Notice dated 10/7/24	Will								
CB-3	11/19/24	Tim Ziemba	Drain Services, Inc. Default Notice dated 9/19/24	Will								
CB-4	11/19/24	Tim Ziemba	Drain Services, Inc. Default Notice dated 7/18/24	Will								
CB-5	11/19/24	Tim Ziemba	Drain Services, Inc. Default Notice dated 6/19/24	Will								

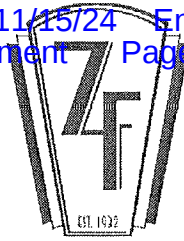
* - O - Original Record & Authenticity Only
* - A - Admitted into Evidence for all purposes
§ - Federal Rule of Evidence Rule Number

Irregular Exhibits: _____

EX. NO.	DATE	WITNESS	DESCRIPTION	WILL OR MAY	*STIPULATED	OFFERED	§OBJECTION	RESERVED	OVERRULED	SUSTAINED	WITHDRAWN	RECEIVED
CB-6	11/19/2024	Kevin Cameron	Copy of Envelope and Check from Drain Services, Inc. to Choice Bank	Will								
CB-7	11/19/2024	Kevin Cameron	DSI Check DSI inv holding 6.28.24 thru 10.17 (version 1) spreadsheet	Will								
Doc. # on Docket	11/19/2024	Kevin Cameron	Any document filed in this Proceeding, including Schedules, Balance Sheet, Profit and Loss Statement, and bank account statements.	Will (some)								

Sandra B. Dittus*
 Tracy A. Kennedy*~
 John D. Schroeder*
 Jocelyn A. Dravitz*
 Abigayle M. Lindgren*
 Ryan W. Ames*^
 Lauren K. Dub

* Also licensed in Minnesota
 ~ Also licensed in Arizona
 ^ Also licensed in Montana



3100 South Columbia Road, Suite 200
 Grand Forks ND 58201
 (701) 772-8111
 (701) 772-7328 (fax)

Website: www.northdakotalaw.net
 email: firm@northdakotalaw.net

ZIMNEY FOSTER P.C.

Attorneys at Law

October 16, 2024

Drain Services Inc.
 415 Main Ave E, Unit 691
 West Fargo ND 58078

Via First Class Mail

Erik A. Ahlgren
 Ahlgren Law Office, PLLC
 220 W. Washington Ave, Ste 105,
 Fergus Falls, MN 56537
Erik@Ahlgrenlawoffice.net

Via First Class Mail and email

RE: Drain Services Inc. | North Dakota Bankruptcy No. 23-30352
Notice of Default under Drain Services, Inc's Second Amended Subchapter V Plan of Reorganization [Doc. 142]

Dear Drain Services Inc. and Mr. Ahlgren,

As you know, I represent Choice Financial Group ("Choice Bank") with regard to the Bankruptcy matter where Drain Services Inc. is the Debtor, and Mr. Ahlgren is now its attorney, North Dakota Bankruptcy No. 23-30352. I am writing to you to give you each notice that Drain Services Inc. is in default of its obligations under the terms of the Drain Services, Inc's Second Amended Subchapter V Plan of Reorganization [Doc. 142] (the "Plan").

Please take notice that Drain Services Inc. is in default under the Plan for the reasons noted below:

1. Failure to pay to Choice Bank \$4,689.28 on or before October 15, 2024, required under Article 4, Class 2 of the Plan.
2. Failure to file with the Bankruptcy Court on or before the first business day succeeding the fourteenth calendar day of October 2024 the following items required under Section 8.07 of the Plan: (i) an unaudited statement of profit and loss for the most recently concluded calendar quarter; (ii) an unaudited balance sheet as of the last business day of the most recently concluded calendar quarter; and (iii) when the Debtor has caused a federal tax return to be filed at any time during the most recently concluded calendar quarter, a copy of said federal tax return.

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EXHIBIT

CB-1

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October 16, 2024

Note, Debtor previously filed profit and loss statements (Doc. 167 and 171), and balance sheets (Doc. 166 and 170) these are entirely inadequate in light of the disclosed bank statements. They lack any details that would be sufficient to understand Debtor's operations and cash flows. Choice Bank believes this is not a good faith attempt to file the required financial statements required under the Plan.

Note further, under applicable IRS regulations, the time for Debtor to have timely filed a 2023 tax return has now expired. While the extension document was previously filed with the court (Doc. 168), the tax return should have now been filed.

This letter is the Default Notice as defined in the Plan at Article 4, Class 2.

Drain Services Inc. may cure the delinquency within ten (10) calendar days of the mailing of this letter. Drain Services Inc. may cure the default by making the delinquent payment to Choice Bank at 4501 23rd Avenue S., Fargo, ND 58104, on or before October 28, 2024 (the first business day after expiration of the 10-day notice period).

Further, Debtor may cure the non-monetary defaults by filing with the Bankruptcy Court on or before October 28, 2024, the following items required under Section 8.07 of the Plan: (i) an unaudited statement of profit and loss for the most recently concluded calendar quarter (and the prior calendar quarter); (ii) an unaudited balance sheet as of the last business day of the most recently concluded calendar quarter (and the prior calendar quarter); and (iii) the Debtor's federal tax return.

If Debtor fails to cure the defaults by October 28, 2024, Choice Bank will bring before the court the Delinquency Motion as contemplated in the Plan.

Note this letter does not amend or supersede the notice sent to you on October 7, 2024. The time to cure the defaults noted in that letter are not extended by this notice.

Regards,



John D. Schroeder

Cc: Thomas Kaputsa, Subchapter V Trustee (via email only)
Sarah J. Wencil, Office of the U.S. Trustee (via email only)
Tim Ziemba, Choice Bank (via email only)

Sandra B. Dittus*
Tracy A. Kennedy*~
John D. Schroeder*
Jocelyn A. Dravitz*
Abigayle M. Lindgren*
Ryan W. Ames*^
Lauren K. Dub

Website: www.northdakotalaw.net
email: firm@northdakotalaw.net



ZIMNEY FOSTER P.C.

Attorneys at Law

October 7, 2024

Drain Services Inc.
575 County Road 10
Mapleton ND 58059

Via First Class Mail

Erik A. Ahlgren
Ahlgren Law Office, PLLC
220 W. Washington Ave, Ste 105,
Fergus Falls, MN 56537
Erik@Ahlgrenlawoffice.net

Via First Class Mail and email

**RE: Drain Services Inc. | North Dakota Bankruptcy No. 23-30352
Notice of Default under Drain Services, Inc's Second Amended Subchapter V Plan of
Reorganization [Doc. 142]**

Dear Drain Services Inc. and Mr. Ahlgren,

As you know, I represent Choice Financial Group ("Choice Bank") with regard to the Bankruptcy matter where Drain Services Inc. is the Debtor, and Mr. Ahlgren is now its attorney, North Dakota Bankruptcy No. 23-30352. I am writing to you to give you each notice that Drain Services Inc. is in default of its obligations under the terms of the Drain Services, Inc's Second Amended Subchapter V Plan of Reorganization [Doc. 142] (the "Plan").

Please take notice that Drain Services Inc. is in default under the Plan for the reasons noted below:

1. Failure to pay certain fees and expenses due to Maurice B. VerStandig and The Dakota Bankruptcy Firm, LLC as detailed in the Notice of Default dated September 5, 2024, filed by Maurice B. VerStandig [Doc. 169].
2. Violation of the provisions of the Plan under Section 8.08 Notice of Large Expenditures, in that Debtor had a transfer of \$50,000.00 out of Debtor's BankNorth checking account on June 28, 2024, and provided no advance notice to creditors. Despite demand first made by the undersigned on Debtor's counsel on September 4, 2024 for an explanation of this expenditure, none has been provided to date.

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EXHIBIT

CB-2

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Page | 2
October 7, 2024

This letter is the Default Notice as defined in the Plan at Article 4, Class 2. Drain Services Inc. may cure the delinquency within ten (10) calendar days of the mailing of this letter.

If Debtor fails to cure the defaults by October 17, 2024, Choice Bank will bring before the court the Delinquency Motion as contemplated in the Plan.

Regards,

A handwritten signature in black ink, appearing to read "John D. Schroeder". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John D. Schroeder

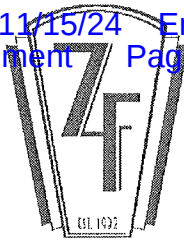
Cc: Thomas Kaputsa, Subchapter V Trustee (via email only)
Sarah J. Wencil, Office of the U.S. Trustee (via email only)
Tim Ziemba, Choice Bank (via email only)

Sandra B. Dittus*
Tracy A. Kennedy*~
John D. Schroeder*
Jocelyn A. Dravitz*
Abigayle M. Lindgren*
Ryan W. Ames*^

* Also licensed in Minnesota
~ Also licensed in Arizona
^ Also licensed in Montana

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Grand Forks ND 58201
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(701) 772-7328 (fax)

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email: firm@northdakotalaw.net



ZIMNEY FOSTER P.C.

Attorneys at Law

September 19, 2024

Drain Services Inc.
575 County Road 10
Mapleton ND 58059

Via First Class Mail

Erik A. Ahlgren
Ahlgren Law Office, PLLC
220 W. Washington Ave, Ste 105
Fergus Falls, MN 56537
Erik@Ahlgrenlawoffice.net

Via First Class Mail and email

**RE: Drain Services Inc. | North Dakota Bankruptcy No. 23-30352
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Reorganization [Doc. 142]**

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Please take notice that Drain Services Inc. is in default under the Plan for its failure to make payment when due and for the other reasons noted below, if any:

1. Failure to pay to Choice Bank \$4,689.28 on or before September 15, 2024, required under Article 4, Class 2 of the Plan.

This letter is the Default Notice as defined in the Plan at Article 4, Class 2. Drain Services Inc. may cure the delinquency within ten (10) calendar days of the mailing of this letter. Drain Services Inc. may cure the default by making the delinquent payment to Choice Bank at 4501 23rd Avenue S., Fargo, ND 58104, on or before September 30, 2024 (the first business day after expiration of the 10-day notice period).

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EXHIBIT

CB-3


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Page | 2

September 19, 2024

If Debtor fails to cure the default by September 30, 2024, Choice Bank will bring before the court the Delinquency Motion as contemplated in the Plan.

Regards,

A handwritten signature in black ink, appearing to read "John D. Schroeder", with a long horizontal flourish extending to the right.

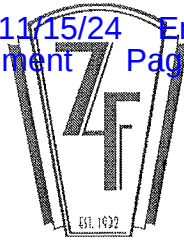
John D. Schroeder

Cc: Thomas Kaputsa, Subchapter V Trustee (via email only)
Sarah J. Wencil, Office of the U.S. Trustee (via email only)
Tim Ziemba, Choice Bank (via email only)

Sandra B. Dittus*
Tracy A. Kennedy*~
John D. Schroeder*
Jocelyn A. Dravitz*
Abigayle M. Lindgren*
Ryan W. Ames*^

* Also licensed in Minnesota
~ Also licensed in Arizona
^ Also licensed in Montana

Website: www.northdakotalaw.net
email: firm@northdakotalaw.net



ZIMNEY FOSTER P.C.

Attorneys at Law

July 18, 2024

Drain Services Inc.
575 County Road 10
Mapleton ND 58059

Via First Class Mail

Erik A. Ahlgren
Ahlgren Law Office, PLLC
220 W. Washington Ave, Ste 105
Fergus Falls, MN 56537
Erik@Ahlgrenlawoffice.net

Via First Class Mail and email

RE: Drain Services Inc. | North Dakota Bankruptcy No. 23-30352
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Please take notice that Drain Services Inc. is in default under the Plan for its failure to make payment when due and for the other reasons noted below, if any:

1. Failure to pay to Choice Bank \$4,689.28 on or before July 15, 2024, required under Article 4, Class 2 of the Plan.

This letter is the Default Notice as defined in the Plan at Article 4, Class 2. Drain Services Inc. may cure the delinquency within ten (10) calendar days of the mailing of this letter. Drain Services Inc. may cure the default by making the delinquent payment to Choice Bank at 4501 23rd Avenue S., Fargo, ND 58104, on or before July 29, 2024 (the first business day after expiration of the 10-day notice period).

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EXHIBIT

CB-4

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Page | 2
July 18, 2024

If Debtor fails to cure the default by July 29, 2024, Choice Bank will bring before the court the Delinquency Motion as contemplated in the Plan.

Regards,

A handwritten signature in black ink, appearing to read "John D. Schroeder", with a stylized, flowing script.

John D. Schroeder

Cc: Thomas Kaputsa, Subchapter V Trustee (via email only)
Sarah J. Wencil, Office of the U.S. Trustee (via email only)
Tim Ziemba, Choice Bank (via email only)

Sandra B. Dittus*
 Tracy A. Kennedy*~
 John D. Schroeder*
 Jocelyn A. Dravitz*
 Abigayle M. Lindgren*
 Ryan W. Ames*^

* Also licensed in Minnesota
 ~ Also licensed in Arizona
 ^ Also licensed in Montana

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ZIMNEY FOSTER P.C.

Attorneys at Law

June 19, 2024

Drain Services Inc.
 575 County Road 10
 Mapleton ND 58059

Via First Class Mail

Erik A. Ahlgren
 Ahlgren Law Office, PLLC
 220 W. Washington Ave, Ste 105
 Fergus Falls, MN 56537
Erik@Ahlgrenlawoffice.net

Via First Class Mail and email

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This letter is the Default Notice as defined in the Plan at Article 4, Class 2. Drain Services Inc. may cure the delinquency within ten (10) calendar days of the mailing of this letter. Drain Services Inc. may cure the default by making the delinquent payment to Choice Bank at 4501 23rd Avenue S., Fargo, ND 58104, on or before July 1, 2024 (the first business day after expiration of the 10-day notice period).

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EXHIBIT

CB-5

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Page | 2
June 19, 2024

If Debtor fails to cure the default by July 1, 2024, Choice Bank will bring before the court the Delinquency Motion as contemplated in the Plan.

Regards,



John D. Schroeder

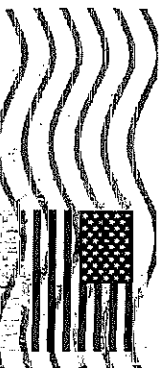
Cc: Thomas Kaputsa, Subchapter V Trustee (via email only)
Sarah J. Wencil, Office of the U.S. Trustee (via email only)
Tim Ziemba, Choice Bank (via email only)



drainservices
INCORPORATED

415 main ave e, unit 691
west fargo, nd 58078

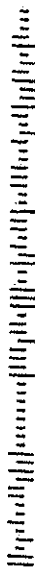
FARGO ND 581
12 NOV 2024 PM 1 L



fargomoorhead sewer authority

CHOICE BANK
C/O TIM [REDACTED] CAMBRIDGE
4501 23RD AVE S
FARGO, ND [REDACTED]
58104

58104-878201



AMOUNT ONLY

941110 11616222 117050616011

MP

MEMO OCT 24

VALUES-BASED BANKING

BANKNORTH
www.banknorth.com



DOLLARS



\$ 68915.00

12-11-11
DATE

PAY TO THE ORDER OF

DRAIN SERVICES INC.
415 MAIN AVE E # 691
WEST FARGO, ND 58078

1176

77-604/913

EXHIBIT

CB-6

exhibitsticker.com

DATE	DESCRIPTION	AMOUNT	FROM DSI	TO DSI	BALANCE THIS ACCOUNT
6/28/2024	TRANSFER ONLINE 1742830594	50000	50000		50000
7/1/2024	TRANSFER ONLINE 1742830594	-4000		4000	46000
7/1/2024	TRANSFER ONLINE 1742830594	-2524.8		2524.8	43475.2
7/1/2024	TRANSFER ONLINE 1742830594	-1000		1000	42475.2
7/1/2024	TRANSFER ONLINE 1742830594	-1000		1000	41475.2
7/1/2024	TRANSFER ONLINE 1742830594	-1000		1000	40475.2
7/2/2024	TRANSFER ONLINE 1742830594	-1000		1000	39475.2
7/3/2024	TRANSFER ONLINE 1742830594	-4000		4000	35475.2
7/3/2024	KEVIN PAYROLL JULY PER KEVIN S PHONE CALL	-5000			35475.2
7/5/2024	TRANSFER ONLINE 1742830594	-5000		5000	30475.2
7/8/2024	TRANSFER ONLINE 1742830594	-5000		5000	25475.2
7/8/2024	TRANSFER ONLINE 1742830594	-1000		1000	24475.2
7/9/2024	TRANSFER ONLINE 1742830594	-2000		2000	22475.2
7/10/2024	TRANSFER ONLINE 1742830594	-1000		1000	21475.2
7/10/2024	PHONE TRNSF DEB	-3000		3000	18475.2
7/11/2024	TRANSFER ONLINE 1742830594	-11000		11000	7475.2
7/15/2024	TRANSFER ONLINE 1742830594	-3000		3000	4475.2
7/16/2024	TRANSFER ONLINE 1742830594	-2000		2000	2475.2
7/18/2024	TRANSFER ONLINE 1742830594	-500		500	1975.2
7/19/2024	TRANSFER ONLINE 1742830594	-673.96		673.96	1301.24
7/22/2024	TRANSFER ONLINE 1742830594	-2000		2000	-698.76
7/22/2024	TRANSFER ONLINE 1742830594	-1000		1000	-1698.76
7/23/2024	TRANSFER ONLINE 1742830594	-500		500	-2198.76
7/24/2024	TRANSFER ONLINE 1742830594	-500		500	-2698.76
7/26/2024	TRANSFER ONLINE 1742830594	-500		500	-3198.76
7/26/2024	TRANSFER ONLINE 1742830594	25000	25000		21801.24
7/29/2024	TRANSFER ONLINE 1742830594	-1000		1000	20801.24
7/29/2024	TRANSFER ONLINE 1742830594	-500		500	20301.24
7/30/2024	TRANSFER ONLINE 1742830594	-4500		4500	15801.24
7/30/2024	TRANSFER ONLINE 1742830594	-4000		4000	11801.24
7/30/2024	TRANSFER ONLINE 1742830594	-4000		4000	7801.24
7/30/2024	TRANSFER ONLINE 1742830594	-500		500	7301.24
8/1/2024	TRANSFER ONLINE 1742830594	-1500		1500	5801.24
8/1/2024	TRANSFER ONLINE 1742830594	-1000		1000	4801.24
8/1/2024	TRANSFER ONLINE 1742830594	-500		500	4301.24
8/2/2024	TRANSFER ONLINE 1742830594	-4500		4500	-198.76
8/2/2024	TRANSFER ONLINE 1742830594	-1800		1800	-1998.76
8/5/2024	TRANSFER ONLINE 1742830594	-200		200	-2198.76
8/5/2024	TRANSFER ONLINE 1742830594	-200		200	-2398.76
8/5/2024	TRANSFER ONLINE 1742830594	-200		200	-2598.76
8/5/2024	TRANSFER ONLINE 1742830594	-100		100	-2698.76

EXHIBIT

CB-7

exhibits123.com

8/6/2024 TRANSFER ONLINE 1742830594	-300	300	-2998.76
8/6/2024 TRANSFER ONLINE 1742830594	-100	100	-3098.76
8/8/2024 TRANSFER ONLINE 1742830594	-100	100	-3198.76
8/9/2024 TRANSFER ONLINE 1742830594	-200	200	-3398.76
8/9/2024 TRANSFER ONLINE 1742830594	-100	100	-3498.76
8/12/2024 TRANSFER ONLINE 1742830594	-100	100	-3598.76
8/12/2024 TRANSFER ONLINE 1742830594	-100	100	-3698.76
8/15/2024 PHONE TRNSF DEB	-10000	10000	-13698.76
8/15/2024 PHONE TRNSF DEB	-2000	2000	-15698.76
8/15/2024 AUTO PAYMENT FOR LOAN # 2080743	-2126.04		-15698.76
8/15/2024 TRANSFER ONLINE 1742830594	33000	33000	17301.24
8/15/2024 TRANSFER ONLINE 1742830594	2500	2500	19801.24
8/16/2024 PHONE TRNSF DEB	-2000	2000	17801.24
8/19/2024 TRANSFER ONLINE 1742830594	-6373.96	6373.96	11427.28
8/19/2024 TRANSFER ONLINE 1742830594	-1000	1000	10427.28
8/19/2024 TRANSFER ONLINE 1742830594	-1000	1000	9427.28
8/19/2024 PHONE TRNSF DEB	-4300	4300	5127.28
8/20/2024 TRANSFER ONLINE 1742830594	-2000	2000	3127.28
8/20/2024 TRANSFER ONLINE 1742830594	-100	100	3027.28
8/20/2024 TRANSFER ONLINE 1742830594	4000	4000	7027.28
8/22/2024 TRANSFER ONLINE 1742830594	-900	900	6127.28
8/26/2024 TRANSFER ONLINE 1742830594	-1000	1000	5127.28
8/26/2024 TRANSFER ONLINE 1742830594	-500	500	4627.28
8/26/2024 TRANSFER ONLINE 1742830594	-500	500	4127.28
8/27/2024 TRANSFER ONLINE 1742830594	-1000	1000	3127.28
8/27/2024 TRANSFER ONLINE 1742830594	-1000	1000	2127.28
8/29/2024 TRANSFER ONLINE 1742830594	-6000	6000	-3872.72
9/19/2024 TRANSFER ONLINE 1742830594	-15173.96	15173.96	-19046.68
9/19/2024 TRANSFER ONLINE 1742830594	-150	150	-19196.68
9/19/2024 TRANSFER ONLINE 1742830594	30000	30000	10803.32
9/20/2024 TRANSFER ONLINE 1742830594	-400	400	10403.32
9/23/2024 TRANSFER ONLINE 1742830594	-1000	1000	9403.32
9/23/2024 TRANSFER ONLINE 1742830594	-450	450	8953.32
9/26/2024 TRANSFER ONLINE 1742830594	-1000	1000	7953.32
9/26/2024 TRANSFER ONLINE 1742830594	-1000	1000	6953.32
9/27/2024 TRANSFER ONLINE 1742830594	-1500	1500	5453.32
9/30/2024 TRANSFER ONLINE 1742830594	-5000	5000	453.32
10/1/2024 TRANSFER ONLINE 1742830594	-1500	1500	-1046.68
10/2/2024 TRANSFER ONLINE 1742830594	13000	13000	11953.32
10/3/2024 TRANSFER ONLINE 1742830594	-1000	1000	10953.32
10/3/2024 TRANSFER ONLINE 1742830594	5000	5000	15953.32
10/4/2024 TRANSFER ONLINE 1742830594	-1000	1000	14953.32
10/8/2024 TRANSFER ONLINE 1742830594	-3000	3000	11953.32
10/8/2024 TRANSFER ONLINE 1742830594	-1000	1000	10953.32

10/9/2024 TRANSFER ONLINE 1742830594	-5000	5000	5953.32
10/10/2024 TRANSFER ONLINE 1742830594	-1000	1000	4953.32
10/11/2024 TRANSFER ONLINE 1742830594	-1000	1000	3953.32
10/11/2024 TRANSFER ONLINE 1742830594	-1000	1000	2953.32
10/17/2024 Pending: TRANSFER ONLINE DR	-1873.96	1873.96	1079.36
10/17/2024 Pending: TRANSFER ONLINE CR	5000	5000	6079.36
10/17/2024 Pending: TRANSFER ONLINE DR	-6079.36	6079.36	0

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:)	
)	
Drain Services Inc.)	Case No. 23-30352
)	(Chapter 11)
)	
Debtor.)	
_____)	

DECLARATION OF SERVICE

KAREN SYRSTAD, a legal assistant in the office of Zimney Foster P.C., 3100 South Columbia Road, Ste. 200, Grand Forks, ND 58201, is of legal age and not a party to or interested in the above-entitled matter and declares, that on November 15, 2024, she served the following:

- 1. CREDITOR CHOICE FINANCIAL GROUP'S EXHIBIT LIST – LIFT OF STAY MOTION w/attached EXHIBITS CB-1 – CB-7**
- 2. CREDITOR CHOICE FINANCIAL GROUP'S WITNESS LIST – LIFT OF STAY MOTION**
- 3. THIS DECLARATION OF SERVICE**

to the people who are Filing Users, by automatic e-mail notification pursuant to the Electronic Case Filing System and this notice constitutes service, and by sending the same in a postage paid envelope addressed to each person named below, at the address stated below, which is the last known address of the addressee, and by depositing said envelope in the United States mail in Grand Forks, North Dakota.

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And I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: November 15, 2024 at Grand Forks, North Dakota

/s/ Karen Syrstad

KAREN SYRSTAD